



January 23, 2008

Carole Davis

Co-Executive Secretary of the Dietary Guidelines Advisory Committee  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Dear Ms. Davis:

Oldways', an internationally respected non-profit organization, mission focuses on educating consumers about the benefits of traditional food patterns, sustainable agriculture, and healthy eating and drinking. Some of our most recognized work includes the scientific advancement of the Mediterranean Diet and creation of the Mediterranean Diet Pyramid.

Since its introduction in the United States in sixteen years ago, the Mediterranean Diet has become the most studied eating pattern in existence and has been coined as the "Gold Standard" of dietary patterns.<sup>1</sup>

Half a century of nutrition research supports its "Gold Standard" status as well as its beneficial effects on overall mortality<sup>2-8</sup> and several chronic diseases—heart disease<sup>9-15</sup>, cancer<sup>16-19</sup>, diabetes<sup>20-22</sup>, and Alzheimer's disease<sup>23-25</sup>.

Based on this research and similar findings from more than 1000 peer-reviewed scientific papers, Oldways promotes four primary dietary principles, which serve as the basis for the Mediterranean Diet Pyramid (See page 3):

- 1) Choose a combination of plant-based foods at every meal: Grains (mostly whole), fruit, vegetables, beans, nuts, seeds, legumes, healthy fats, and herbs and spices;
- 2) Eat fish (as a vehicle for long-chain fatty acid intake) at least twice a week;
- 3) Include eggs, dairy, and poultry, if these foods fit in to an individuals food preferences and lifestyle, on a daily to weekly basis ; and
- 4) Enjoy sweets and meats less often and in smaller amounts.

As the 2010 Dietary Guidelines Committee convenes for its second meeting, we urge Advisory Committee members to incorporate the nutrition principles of the Mediterranean Diet. We believe that doing so will be met with wide acceptance from American consumers for several reasons:

1. ***The Mediterranean Diet is the most studied and recommended eating pattern in existence.*** More than 1,000 studies have been published over the past five decades. The majority of these report remarkably consistent findings.



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*The food issues think tank – promoting healthy, traditional and sustainable food choices*

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2. *American consumers currently eat and enjoy many of the foods consumed in a Mediterranean-style Diet.* Therefore, adopting these principles will not require a major dietary shift for consumers.
3. *These foods are readily available in the United States.* Mediterranean foods are widespread in American grocery stores, with many reporting record category sales.

Another factor simplifying the adoption of these principles is that many of them already appear in the 2005 Dietary Guidelines: both the current Dietary Guidelines and the Mediterranean Diet Pyramid emphasize whole grain, fruit, and vegetable consumption while encouraging a limited intake of calories from discretionary foods.

However, two major differences exist between the science supporting the Mediterranean Diet and content of the current Dietary Guidelines, which form the basis of our recommendations to the Dietary Guidelines Advisory Committee:

- **Recommendation #1**  
Group plant-based and animal-based proteins separately.
- **Recommendation #2**  
Group monounsaturated and polyunsaturated fats separately from saturated and trans fats.

Oldways appreciates the opportunity to contribute to the 2010 Dietary Guidelines and firmly believes that these recommendations serve as a straightforward means of improving the health of the American public.

Sincere regards from all of us at Oldways,

K. Dun Gifford, JD  
President

Sara Baer-Sinnot  
Executive Vice President

Nicki Heverling, MS, RD  
Med Foods Alliance Manager



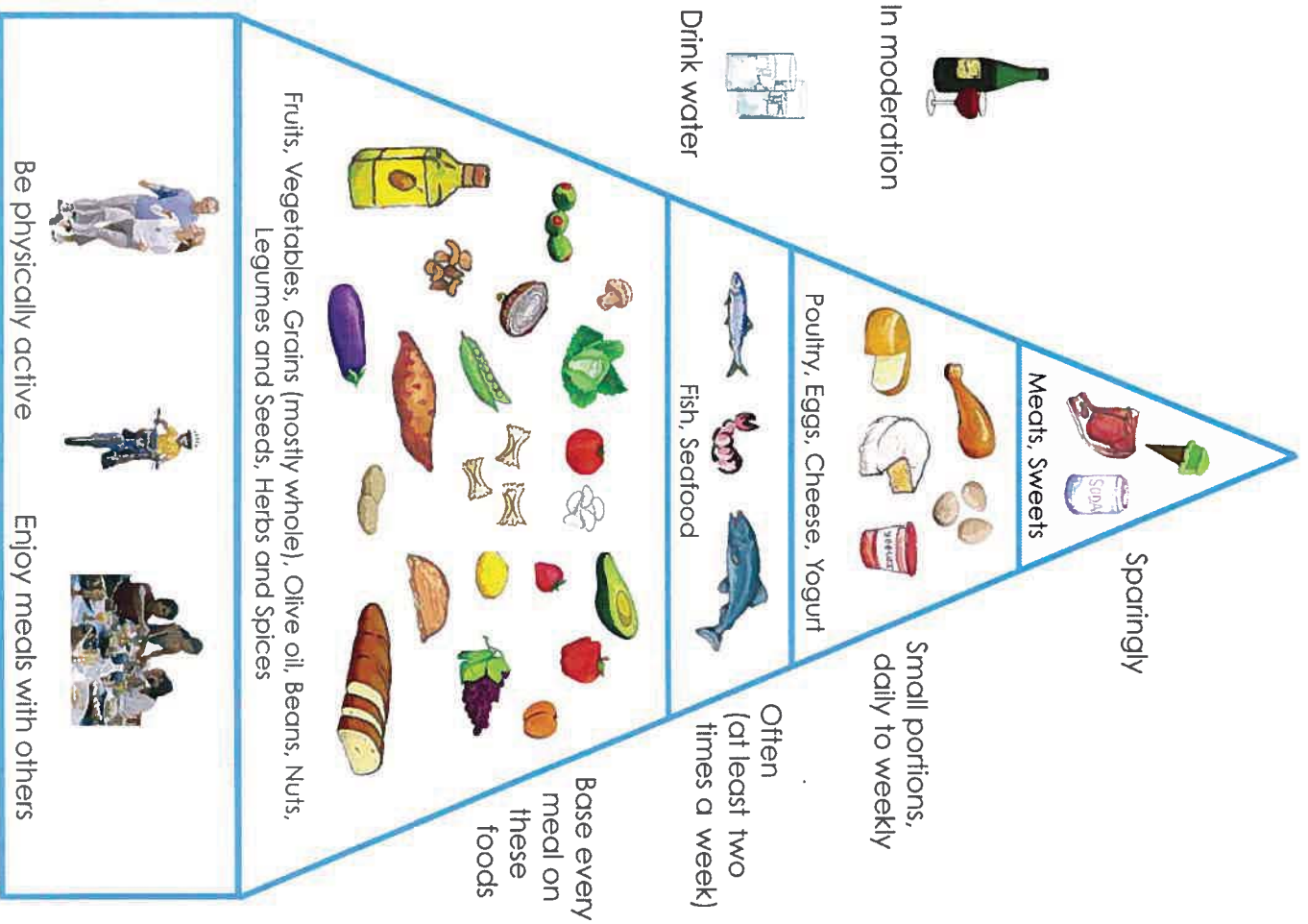
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## Mediterranean Diet Pyramid

A contemporary approach to delicious, healthy eating





## Supporting Research

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